As a licensed Amateur Radio operator since 1969 and as a Radio Systems Engineer employed by Motorola for the last 27 years, I feel qualified to provide you with both operational and technical guidance in regard to Rulemaking RM-10313. I understand that this rulemaking deals with a change to the Part 97 rules to allow an auxiliary station on all 2 meter frequencies above 144.5 MHz.

I am in favor of this rule change for the following reasons and with the following comments.

1. The 420-450 MHz band is crowded with repeater operation and intersystem links and is essentially unavailable for auxiliary links in contrast to when the rules were originally.

2. The 420-450 MHz band is gradually getting smaller because of other FCC actions relating to unlicensed Part 15 operations.

3. The 220 MHz band has also been made less available for auxiliary link operations because of recent FCC reallocations of that spectrum. Amateur Radio manufacturers have traditionally avoided this band because of the instability of this spectrum allocation.

4. The next lower frequency band that provides similar propagation characteristics is the 144-148 MHz band and is the prime candidate for additional auxiliary operations.

5. Because of increased presence of restrictive antenna covenants and increased density of housing, there is an increased need to remote control amateur radio equipment to maintain sufficient HF operating proficiency.

6. I have personally experimented with control operator supervised operation of the Kenwood Sky Command Equipment using a full duplex Kenwood TH-D7 dual band portable radio running 50mw of transmitter power on 440 MHz and a Kenwood TS2000 HF transceiver running 5 watts of power on 145 MHz.. Both were operated with dummy loads because my need for coverage was very limited. I found the operation to be secure and reliable. This configuration provided an effective and flexible method of providing hand held HF communications. I disagree with the earlier FCC decision which considered the Sky Command system to be an auxiliary link. I consider that the operation is better characterized as an HF remote base with a 440-450MHz auxiliary link because there is no signaling, command, or control occurring on the 144-148 MHz band.

7. The present implementation of the Sky Command uses a 440-450 MHz link to command and control the TS2000 HF transceiver. The only portion of the operation which occupies the 144-148 MHz spectrum is the transmission of the HF receive audio.

8. Much of the existing 420-450 MHz auxiliary link operation uses higher transmitter power and elevated directional antennas. I feel that auxiliary operation on the 144-148 MHz band should be limited in transmitter power and antenna elevation so that interference to existing simplex or repeater operation is avoided. Perhaps a new definition of “personal auxiliary” service for operation on the 144-148 MHz band should be used, similar method to Bluetooth.

9. The important benefit of increased flexibility for auxiliary operation would be to increase the flexibility and availability of public service and emergency communications. Amateur Radio operators have increased access to transceivers which are capable of simultaneous dual band operation and cross band repeater operation which was not dreamed about when the existing Part 97 rules were put in place. Knowledgeable Amateur Radio operators, if allowed by this rule change, would be able to more quickly and reliably deploy communications in times of local, regional, and national needs.

10. It is my contention that if “personal auxiliary” operation is freely allowed in portions of the 144-148 MHz band that Amateur Radio operators will be able to practice and perfect enhanced communications capabilities using the technology available today which were not available when this particular FCC rule was put in place.

Richard Illman
Extra Class License – AH6EZ
42W423 Audubon Ct.
St. Charles, IL 60175